

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
HAROLD EUGENE CLARK, SR	:	
aka Harold Eugene Clark	:	CASE NO. 1:17-bk-02060
JACKQYLN DALE CLARK	:	
Debtors	:	
	:	
WESTLAKE FINANCIAL SERVICES,	:	
Movant	:	
	:	
v.	:	
	:	
HAROLD EUGENE CLARK, SR	:	
aka Harold Eugene Clark	:	
JACKQYLN DALE CLARK,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted that Harold Eugene Clark, Sr. lives at 1719 Glenside Drive, Harrisburg, PA; however, the Joint Debtor, Jackqyln Dale Clark died on April 8, 2018.
3. Admitted.
4. Admitted.
5. Admitted.
6. Proof of balance owed is demanded at trial and this averment is therefore denied.
7. Admitted.
8. Proof of default is demanded at trial and this averment is therefore denied. It is the Debtor's understanding that his son has worked out a payment arrangement with Westlake to retain the vehicle. Moreover, Movant's counsel is investigating whether there was any credit insurance on the loan.

9. Proof of value of the vehicle is demanded at trial and this averment is therefore denied.
10. Admitted.
11. Admitted.
12. Proof of depreciation is demanded at trial and this averment is therefore denied.
13. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com